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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

Charles K. Nguyen :
Hien T. Nguyen : No. 19-13854
Debtors :
:

CREDITOR, THO NGUYENS,
OBJECTION TO DISCHARGE

Creditor, Tho Nguyen, objects to the proposed Discharge of Debtors in this case for the following reasons:

1. Objector believes, and therefore avers, that Debtors have committed fraud upon creditors and the court by hiding income, failing to disclose significant changes in their household income, failing to amend schedules I and J and the Plan to reflect significant household contributions by Ta Nguyen (Ta), son of Hien Nguyen, who lives with Debtors, failing to amend Form 122C to reflect such changes in projected income through the life of the Plan, and engaging in business through their proxy, Ta, while claiming no such business is being operated on their behalf. The 2021 1040 of TA reflects profit from his alleged LLC of \$101,146.00 while he lived with Debtors

and contributed to household expenses, none of which was disclosed to creditors or the Court. Objector believes, and therefore avers, that the profit is actually higher as the claimed deductions from the LLC gross include \$249,220 in claimed supplies. Finally, Objector believes, and therefore avers, that some customers of the business allegedly operated by TA know and understand Hien to be the true owner.

2. Pennymac Loan services filed a Motion for Relief and and Objection to Notice of Final Cure as it alleges Debtors are delinquent in their secured payments such that Debtors have not fully complied with the Plan and are therefore not entitled to a Chapter 13 discharge.

Wherefore, Objector respectfully requests that the proposed discharge be Denied.

Respectfully submitted

/s/ *Matthew R. Nahrgang*

Matthew R. Nahrgang,
Attorney for Objector,
Tho Nguyen